# UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION BUREAU, et al.,

Plaintiffs,

V.

STRATFS, LLC (f/k/a STRATEGIC FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

CASE NO. 1:24cv00040 EAW-MJR

PLAINTIFFS' AMENDED EXHIBIT LIST

# UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

# **EXHIBIT LIST**

Case No.: 24-cv-00040 (X) Plaintiffs
Date: February 1-2, 2024 () Defendants

Exhibi t No.	Description	Marked for Identification	In Evidenc e
1	Global Client Solutions, LLC Documents Relating to Corporate Defendants		
2	Documents Obtained by NYAG including Deposition Transcript of Lauren Montanille (portions)		
3	Declaration of Amy Wagar		
4	RAM Payment, LLC (formerly, Reliant Account Management, LLC) Records		
5	Documents Obtained from Minnesota Attorney General's Office pursuant to CIDs issued to Sunshine Signing Connection, Inc. and National Paralegal and Notary		
6	Transcript of October 20, 2022 Investigational Interview of Steven Pavlow		
7	In-Person Presentation for Debt Negotiation Program for Great Lakes Law Firm		
8	Affidavit of Compliance for Great Lakes Law Firm		
9	Declaration of Christopher Elkins		
10	Declaration of Patricia Griffiths		
11	Declaration of Elizabeth Salva		
12	Additional Declarations (Sabil Edgar, Doris Sheehan and Attachments, Ronald Davis, Elisabeth Nickles, Julianne Kovein, Matthew Sundlov, Stephanie Rodriguez, Cindy Brannan, Edna Kuraica, Mariros Cojuangco Boliche, and Edie Hulbert)		
13	Transcript of Deposition of Rule 30(b)(6) Corporate Representative Jeff Stone (NotaryGO) (portions)		

14	Transcript of Deposition of Rule 30(b)(6) Corporate Representative Mike Song (NotaryGO) (portions)	
15	Transcript of Deposition of Rule 30(b)(6) Corporate Representative Danielle Strengberg Winkelman (NotaryGO) (portions)	
16	Transcript of Deposition of Rule 30(b)(6) Corporate Representative Heather Spitz (NotaryGO) (portion)	
17	Transcript of Deposition of Rule 30(b)(6) Corporate Representative Lisa Marie Munyon (Velsa Holdings d/b/a National Paralegal and Notary) (portions)	
18	Transcript of Deposition of Rule 30(b)(6) Corporate Representative Crystal Willis (Sunshine Signing) (portions)	
19	Transcript of Deposition of Ryan Sasson (portions)	
20	Transcript of Deposition of Mary Lynn Clark (portions)	
21	August 24, 2016 Contract between Express Notary Service, Inc. and Harbor Legal Group	
22	Transcript of Phone Call between Andrew Terrell (SFS) and Scott Graves (consumer) (ADP000013966)	
23	Transcript of Phone Call between Brian and Alicia (Sunshine Signing) (ADP000025025)	
24	Transcript of Phone Call between Andrew Terrell (SFS) and Mr. Nobles (consumer) (ADP000045743)	
25	Transcript of Phone Call between Benjamin Cummings (SFS) and Gail (Sunshine) (ADP000129919)	
26	Transcript of Phone Call between Ryan and Chrissy (ADP000162096)	
27	Transcript of Phone Call between Dan (SFS) and Alicia (Sunshine) (ADP000186370)	
28	Transcript of Phone Call between female SFS employee and Vincent Ovegua (ADP000229140)	
29	Transcript of Phone Call between Andrew Terrell (SFS) and Barbara Jordan (consumer) (ADP000254592)	

30	Transcript of Phone Call Between Bob Duggan and Brian (ADP000899823)	
31	Transcript of Phone Call (ADP00002702)	
32	Transcript of Phone Call Between Nora (Strategic Financial Solutions Representative) and Ian (Consumer) (ADP000394543)	
33	Transcript of Phone Call (ADP000394552)	
34	Transcript of Phone Call between Benjamin Cummings (SFS) and Gail (Sunshine Signing) (ADP000101599)	
35	Transcript of Phone Call between Andrew Terrell (SFS) and Bonnie Brewster (consumer) ADP000285796	
36	Transcript of Phone Call between Daniel (SFS) and Alicia (Sunshine) (ADP000306212)	
37	Transcript of Phone Call between Andrew Chiarello (SFS) and Gerald Smith (consumer) (ADP000349415)	
38	Transcript of Phone Call between Aura Aguilera (SFS) and Edwin Felton (consumer) ADP000456683	
39	Transcript of Phone Call between Aura Aguilera (SFS) and Montonya Macbeth (consumer) ADP000478218	
40	Transcript of Phone Call with Aure Aguilera (SFS) and Kim Beazer (consumer) ADP000605071	
41	Transcript of Phone Call between Martina (SFS) and unidentified person and Chad at Notary Go (ADP000781117)	
42	Transcript of Phone Call between Andrew Chiarello (SFS) and Mr. Isen (customer) (ADP000868443)	
43	Transcript of Phone Call between Andrew Chiarello (SFS) and Beth Hart (consumer) (ADP001031639)	
44	Transcript of Phone Call between Aura Aguilera and Tammy (consumer) ADP001075737G	
45	Deposition Transcript of David Tsui (portions)	
46	Deposition Transcript of Willard Lee Shirkey (portions)	

47	Deposition Transcript of John Accardo	
	(portions)	
48	Deposition Transcript of Lorie Soule (portions)	
49	Deposition Transcript of Melissa Riley	
'	(portions)	
50	Deposition Transcript of Eric Howell	
	(portions)	
51	Deposition Transcript of Olga Vrzhezhevski	
	(portions)	
52	Deposition Transcript of Mark Roberts	
	(portions)	
53	Declaration of Michael Duhn	
54	Deposition Transcript of James Agosto	
	(portions)	
55	Deposition Transcript of Craig Horvath	
	(portions)	
56	Deposition Transcript of Jason Blust (portions)	
57	Lists of Notaries and Paralegals - Bedrock	
58	Lists of Notaries and Paralegals - Harbor	
59	Lists of Notaries and Paralegals - Whitestone	
60	Lists of Notaries and Paralegals - Rockwell	
61	NPN Debt Settlement Training	
62	Sunshine Signing Notary Instructions	
	(SUNSHINE-CID-000056)	
63	NPN Signing Terms	
64	Contract between NPN and Guidestone	
65	Presentation, Accardo Deposition Exhibit 4	
66	Affidavit of Compliance, Accardo Deposition	
	Exhibit 5	
67	Jewel Hewett Documents	
68	Transcript of Deposition of Kimberly Brown	
	(portions)	
69	North Carolina State Bar v. Daniel S. Rufty,	
	Consent Order of Discipline	
70	Transcript of Deposition of Peter Fountain	
	(portions)	
71	In re Thomas George Macey and In re Jeffrey	
	John Aleman - Report and Recommendation	
	of the Hearing Board - Illinois Attorney	
	Registration	
	And Disciplinary Commission	

72	Global Client Solutions Emails RE Great Lakes Law Firm, LLC (Global_WI_000186 & Global_WI_000187)	
73	Declaration of Joanna Cohen	
74	FTC FACTS for Business Debt Relief Services & the Telemarketing Sales Rule: What People Are Asking	
75	Options for Consumers in Crisis: An Updated Economic Analysis of The Debt Settlement Industry, 2015 by Greg J. Regan	
76	Preliminary Report of the Temporary Receiver (January 31, 2024) (Dkt. 115-1)	
77	CV and Expert Opinion of Nicole Hallett	

Dated: February 2, 2024

Respectfully submitted, Attorneys for Plaintiff Consumer Financial Protection Bureau

ERIC HALPERIN Enforcement Director

RICHA SHYAM DASGUPTA Deputy Enforcement Director

TIMOTHY M. BELSAN Assistant Litigation Deputy

<u>/s/ Vanessa Buchko</u> Vanessa Buchko

E-mail: vanessa.buchko@cfpb.gov

Phone: 202-435-9593

Monika Moore

E-mail: monika.moore@cfpb.gov

Phone: 202-360-5905

Joseph Sanders

E-mail: joseph.sanders@cfpb.gov

Phone: 202-377-9846 1700 G Street, NW Washington, DC 20552 Facsimile: (202) 435-7722

And

#### **LETITIA JAMES**

Attorney General of the State of New York

#### /s/ Christopher L. Boyd

Christopher L. Boyd Assistant Attorney General 350 Main Street, Suite 300A Buffalo, NY 14202

Phone: (716) 853-8457

Email: Christopher.Boyd@ag.ny.gov

Attorney for State of New York

#### PHILIP J. WEISER

Attorney General State of Colorado

### /s/ Kevin J. Burns

Kevin J. Burns, CO Reg. No. 44527 *Pro hac vice* Senior Assistant Attorney General

Colorado Department of Law Ralph L. Carr Judicial Center

Consumer Protection Section

1300 Broadway, 6th Floor

Denver, CO 80203

Phone: (720) 508-6110 Kevin.Burns@coag.gov

Attorneys for Plaintiff State of Colorado, ex rel. Philip J. Weiser, Attorney General

KATHLEEN JENNINGS

Attorney General State of Delaware

### /s/ Marion M. Quirk

Marion M. Quirk (pro hac vice)
Director of Consumer Protection
Kevin D. Levitsky (pro hac vice)
Deputy Attorney General
Delaware Department of Justice
820 N. French Street, 5th Floor
Wilmington, DE 19801
Phone: (302) 683-8810
Marion.Quirk@delaware.gov
Kevin.Levitsky@delaware.gov
Attorneys for State of Delaware

#### KWAME RAOUL

Attorney General State of Illinois

### By: /s/ Greg Grzeskiewicz

Greg Grzeskiewicz, Chief, Consumer Fraud

Bureau

Pro hac vice

Daniel Edelstein, Supervising Attorney,

Consumer Fraud Bureau

Pro hac vice

Amanda E. Bacoyanis, Assistant Attorney

General, Consumer Fraud Bureau

Pro hac vice

Matthew Davies, Assistant Attorney

General,

Consumer Fraud Bureau

Pro hac vice

Office of the Illinois Attorney General

100 W. Randolph Street, 12th Floor

Chicago, Illinois 60601

312-814-2218

Greg.Grzeskiewicz@ilag.gov

Daniel.Edelstein@ilag.gov

Amanda.Bacoyanis@ilag.gov

Matthew.Davies@ilag.gov

Attorneys for the People of the State of Illinois

#### KEITH ELLISON

#### Attorney General of Minnesota

/s/ Evan Romanoff
Evan Romanoff
Assistant Attorney General
Pro hac vice
445 Minnesota Street, Suite 1200
St. Paul, Minnesota 55101-2130
Telephone: (651) 728-4126
evan.romanoff@ag.state.mn.us

Attorney for the State of Minnesota By Its Attorney General, Keith Ellison

JOSHUA H. STEIN Attorney General of North Carolina

## /s/ M. Lynne Weaver

M. Lynne Weaver (pro hac vice) Special Deputy Attorney General N.C. State Bar No. 19397 114 W. Edenton Street Raleigh, NC 27602 Telephone: (919) 716-6039 lweaver@ncdoj.gov

Attorney for the State of North Carolina

JOSHUA L. KAUL Attorney General of Wisconsin

#### /s/ Lewis W. Beilin

Assistant Attorney General (*pro hac vice*) Wisconsin Department of Justice 17 West Main Street Post Office Box 7857 Madison, WI 53707-7857 (608) 266-3076 beilinlw@doj.state.wi.us

Attorney for State of Wisconsin